

FILED 02 MAY '19 13:54 USDC-ORE

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of Oregon

United States of America )

v. )

Andrew Thomas Tager )

Case No. 6:19-mj- 80-MK

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 2018 - Sept 2018 in the county of Coos in the  
       District of Oregon, the defendant(s) violated:

## Code Section

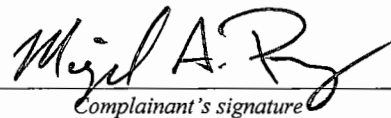
## Offense Description

18 U.S.C. §§2251(a) and 2252A

Production of child pornography and transportation, receipt, and possession  
of child pornography

This criminal complaint is based on these facts:

The attached affidavit of SA Miguel A. Perez, which is incorporated herein

☒ Continued on the attached sheet.


Complainant's signature

Miguel A. Perez, Special Agent, FBI

Printed name and title

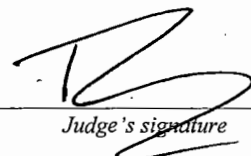
Sworn to before me and signed in my presence.

Date:

5/2/19

City and state:

Eugene, Oregon



Judge's signature

Thomas M. Coffin, U.S. Magistrate Judge

Printed name and title

DISTRICT OF OREGON,

ss: AFFIDAVIT OF MIGUEL A. PEREZ

**Affidavit in Support of a Criminal Complaint and Arrest Warrant**

I, Miguel A. Perez, being duly sworn, do hereby depose and state as follows:

**Introduction and Agent Background**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been since January 2015. I am currently assigned to the Portland Division at the Eugene, Oregon Resident Agency. During my training in the FBI Academy in Quantico, Virginia, I received training in a variety of investigative and legal matters, including the topics of Fourth Amendment Searches and probable cause. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. § 2251, and I am authorized by the Attorney General to request a search warrant

3. This affidavit is made in support of a criminal complaint and arrest warrant for **Andrew Thomas Tager** (hereinafter "**Tager**"), for violation of Title 18, United States Code, § 2251(a), involving the production of child pornography, and Title 18, United States Code, § 2252A, involving the transportation, receipt, and possession of child pornography.

4. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other agents, investigators and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

**Applicable Law**

5. Title 18, U.S.C., § 2251(a) makes it a crime to knowingly employ, use, persuade, induce, entice, or coerce a minor to engage in sexually explicit conduct for the purpose of

producing a visual depiction of that conduct, if the person knows or has reason to know that the visual depiction will be transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce if the visual depiction has actually been transported or transmitted using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce, or if it was produced or transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer.

6. Title 18, United States Code, Section § 2252A (a)(1) makes it a crime to knowingly transport child pornography using any means or facility of interstate or foreign commerce, or in or affecting interstate or foreign commerce by any means, including by computer. Section 2252A(a)(2) makes it a crime to knowingly receive or distribute any child pornography that has been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means or facility, including by computer. Title 18, United States Code, Section 2252A(a)(5)(B) makes it a crime to knowingly possess or access with intent to view child pornography that has been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that were mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, including by computer. The term child pornography is defined in Title 18, United States Code, Section 2256(8).

#### **Statement of Probable Cause**

7. As described more fully below, I believe that **Tager** produced and received child pornography in violation of federal law. My investigation has revealed that, communicating over Kik Messenger (an online messaging platform), an individual—who I believe to be **Tager**—contacted at

least one minor female (V1) and directed her to produce and send him pornographic pictures and videos through Kik Messenger. Many of the instructions to V1, which I believe were made while **Tager** was posing as an employee of the social media platform Musical.ly (now known as TikTok)—and using, notably, the username “**Officialcrowns**” on Kik Messenger—included explicit direction on how V1 should pose and move, what she should wear, what props she should use, and how long the videos needed to be. I believe that **Tager** told V1 to participate in a fictional “Crown Program” and told her that, by sending the pictures and videos, she could earn a “Crown”. He later told V1 that if she quit the program, her videos would be released and people could go and subscribe to view her gallery of photos and videos.

8. The investigation has linked the **Officialcrowns** username to the following email addresses: tagerdude24@gmail.com, tagerdude25@gmail.com, tagerdude28@gmail.com, and jessicamillsmoderator@outlook.com. For example, tagerdude25@gmail.com contains emails in which the account user tells an adult female that she can contact him on his Kik account, “**Officialcrowns**”—which is the same Kik account that **Officialcrowns** used to communicate with V1. Additionally, the two accounts, tagerdude24@gmail.com and tagerdude25@gmail.com exchange emails containing child pornography, discussing whether a minor victim had earned a “Crown” and containing a list of things the victim needed to do—including needing to improve her ability to listen and follow instructions from Musical.ly and her moderator “Musicalcrownpage”. The email accounts appear to indicate that the account user is employing multiple aliases, email accounts, and personas and that he is transferring child pornography and information between the email accounts by sending emails from one account to another. I know, from my training and experience as well as my conversations with other law enforcement officials, that people engaged in the online production of child pornography sometimes create

multiple email and online accounts for themselves and others to use in storing information, transferring child pornography files, keeping track of their child exploitation efforts, or, at times, communicating with other individuals who have been granted access to the accounts.

9. Based on the investigation, including the execution of search warrants on the email accounts, I believe that all the email accounts belong to **Tager**. For example, tagerdude24@gmail.com was found to contain an email addressed to **Andrew Tager** from **Tager**'s credit card company as well as emails with **Tager**'s resume and driver's license attached. Similarly, tagerdude25@gmail.com was found to contain an email in which an individual identifying himself as "**Andrew Tager**" sent someone a copy of **Andrew Tager**'s resume. The email stated that **Tager** is looking for a career in the gaming industry and is signed "Kind Regards, **Andrew Tager**." The resume included what I believe to be **Tager**'s correct phone number (336) 314-6434.

10. My belief that **Tager** is actively involved in the sexual exploitation of children on Snapchat and Musical.ly is borne out by the discovery, through investigation, of TikTok (what Musical.ly is now called) and Snapchat accounts with the name **Cherokeetager**. Review of account records has revealed the **Cherokeetager** user posting a profile picture and videos that appear to be **Tager**, and discussing the "Crown Program" with girls between the ages of 10-12. His instructions to the minors are consistent with the discussion of the "Crown Program" that the user Officialcrowns employed in coercing V1 to produce and send child pornography.

**Identification of V1, Interview, and Review of Her Interactions with OfficialCrowns**

11. On August 29, 2018, the FBI was contacted by the North Bend Police Department in Oregon about a case involving the online sexual corruption of a child. The parents reported that the Victim, V1, a ten year old female, whose identity is known to law enforcement, had been



sending nude photos and videos of herself using Kik to a person they believed was a male. The person, with username "**Officialcrowns**" on Kik, threatened that V1's photos would be released for other to views if she did not continue taking sexually explicit photos and recording videos of herself. V1 was told by the person she would earn "points" by doing as instructed until she reached a level where the images and recordings would not be released. The nature of the verbiage used by **Officialcrowns** with V1 was used in an effort to coerce her to comply with the demands. As a result, V1 complied with the demands and sent the pornographic material to **Officialcrowns** on Kik.

12. On September 4, 2018, V1 was interviewed by a child forensic interviewer in North Bend, Oregon. V1 disclosed that she had an account on Musical.ly. Musical.ly was a social media platform application on which users created and shared short videos. V1 was made aware of Musical.ly by her friend, a 10 year old female, (V2) whose identity is known to law enforcement. Her friend told V1 she could obtain "Crowns" to get access and privileges that were not available to everyone on the application. V1 started talking to a female who identified herself as "Dianna" on the **Officialcrowns** Kik account. V1 stated "Dianna" (hereinafter "**Officialcrowns**") said she worked for Muscial.ly and had access to V1's private account. **Officialcrowns** told V1 if she wanted a crown she had to do certain things to acquire the crown. V1 stated she did not care about having the crown, but was more concerned with protecting the content on her private Musical.ly account.

13. The FBI received consent from the parents of V1 to take possession of her IPod and to review its contents. A review of the Kik conversations between **Officialcrowns** and V1 appear to begin on or about May 15, 2018. V1 sent **Officialcrowns** several pornographic files on Kik, the following is some of what was discussed and shared:

a. The review revealed on or about June 17, 2018, **Officialcrowns** told V1 on Kik that her name was "Dianna". **Officialcrowns** told V1 that once she quit the program, her videos got released to their website. There people can go and subscribe to view her gallery of photos and videos. The only way to lock it down so nobody can subscribe and get her contact information on Muscal.ly was to get back in the program and staying active to finish. This would lock down V1's photos.

b. Later on, **Officialcrowns** sent V1 an image and asked her if she can get a "handle" like this one. V1 sent **Officialcrowns** a picture of a golden colored toilet paper roller rod (the rod in the center of a toilet paper holder) and ask **Officialcrowns** if that would work. **Officialcrowns** responded affirmatively. **Officialcrowns** tells V1 the video has to be 1 minute and 40 seconds and it has to go in as much as V1 can do. V1 sent a file of herself naked from the waist down. V1 is crouching down putting a portion of the golden roller rod in her vagina. V1 asks if it is good and that it is the only one she is doing. **Officialcrowns** responds, "You don't make the rules.. but you did just fine (V1).. good job!!" During the chat **Officialcrowns** tells V1 she lives in California "where the headquarters is located" and V1 responds that she lives in Oregon.

c. On August 10, 2018, **Officialcrowns** tells V1 to get her crop top on and her "knickers". The subject tells V1 she is going to "floss" (Floss is in reference to a type of dance move in which the arms and hips swing from side to side) for 30 seconds with them on and smile really big. V1 responds "Ok" and sends a video to **Officialcrowns** of herself doing a dance with her underwear and crop top on. Later in the conversation, **Officialcrowns** tells V1 to now "floss" with no "knickers". V1 sends a video where she is doing the same dance as before only with no underwear bottoms on and she bends down towards the camera and smiles.

d. V1 asks **Officialcrowns**, “Are we done for the day?” **Officialcrowns** responds, “Almost done”. **Officialcrowns** then tells V1 to turn around and sit on the floor with her back to the camera, arching her back, and no underwear. V1 sends a photo of herself on her knees, buttocks towards the camera but resting upon her feet, head turned over her left shoulder and smiling back at the camera. **Officialcrowns** continues to instruct V1 and she sends two additional videos where she is posing in a similar manner. After sending the images/videos, V1 would ask **Officialcrowns** if the files were ok or good. V1 also asked if she was done taking photos and videos by saying, “Good for the day?” and “Are we good for the night?” After the last video is sent then **Officialcrowns** tells V1, “Tonight you are done...”

e. On August 12, 2018, V1 tells **Officialcrowns** “We have to go fast... Because I want to go to bed soon.” **Officialcrowns** instructs V1 to squat without “knickers on”, and she is going to push her hips back and forth while she rubs her “nunny” with her fingers on her “clit part”. **Officialcrowns** also tells her to, “Go in circles with your fingers and moan quietly... then open it up at the end and hold it open.” V1 sends a video as instructed, rocking her hips back and forth, masturbating and moaning and then holding her labia apart at the end. **Officialcrowns** then instructs V1 to lay on her back this time with her knees up by her sides and scoot up close to the camera. V1 does as instructed with the camera up close to her crotch area. In the video V1 masturbates and then leans forward to turn off the video.

f. **Officialcrowns** asks V1 if it felt good and she responds, “I don’t really know” and “kind of”. **Officialcrowns** tells V1 it will start to feel good after she does it long enough. Then **Officialcrowns** instructs her to lay on her back again like before and instead of circular motions, s/he tell her to go up and down her “nunny” and hold it open longer at the end. Then after that she will want to open her “bottom hole” too and to try to open it up really far. V1 send



a video, does as instructed and at the end she holds her labia apart and pulls her buttocks apart to show her anus.

g. On August 14, 2018, **Officialcrowns** started a chat with V1. **Officialcrowns** asks V1 to send her/him screen shots of her applications on her device including Facebook, Twitter, Instagram, YouTube, Snapchat, Musical.ly/tiktok, and Funimate. V1 responded that she does not have those apps. The subject asks V1 how she stays in contact with her friends at school and at swimming. V1 states her friends do not have phones and only talks to them at school. V1 send the subject screenshots of her phone showing the apps. The subject also requested V1's email "in case Kik messes up." Later in the conversation V1 sends the subject her email address.

**Officialcrowns** asks V1 what is her real age and V1 responded "10 all most 11."

h. On a chat that started on August 19, 2018, **Officialcrowns** advises V1 the "program is changing" and tells her that because school is starting she is going to have to start doing photos with partners on some days. **Officialcrowns** clarifies and tells V1 she is going to have to start doing photo while interacting with a partner, either another girl or another boy. V1 objects to this change and **Officialcrowns** tells her she will start doing them with her younger sister. V1 states she cannot do it with her sister and the subject later responds **Officialcrowns** will have to talk to "Musically". **Officialcrowns** convinces V1 to take a photo side-by-side with her sister. The girls are fully clothed. **Officialcrowns** tells V1 s/he will see if "musically" would like to have the sister take part in the photos.

i. On August 21, 2018, **Officialcrowns** sent V1 a photo to mimic, of a woman bent over at the waist, resting on a counter top with her buttocks towards the camera. The woman is wearing a top and underwear bottoms. V1 sent two photos to the subject of herself mimicking the older woman's pose. **Officialcrowns** also tells V1 to buy a jumbo size Sharpie as part of her

“school shopping”. V1 sends a photo of a normal sized Sharpie. **Officialcrowns** does not explain what the Sharpie will be used for but tells V1 that it will be used the following day. V1 asks the subject “When will I do thing for points?” and **Officialcrowns** responds, “We have a bunch of time to earn points...”

#### **Identification of Email and Social Media Accounts**

14. Kik provided records on September 12, 2018 and October 17, 2018, for the **Officialcrowns** account pursuant to two separate subpoenas. The second subpoena was for updated IP addresses used by **Officialcrowns** to access Kik. The records showed the first and last name on the account was, “:sparkles:Official Moderator:sparkles:”, and the email address listed was gxicjcidthfufwictfsjppp@gmail.com. Information provided by Internet Service Providers for the IP addresses showed the internet was accessed by **Officialcrowns** in the Greensboro, North Carolina area when communicating with V1.

15. On September 10, 2018, I accessed and reviewed the email account belonging to V1 that she had given to **Officialcrowns** on or about August 14, 2018 through Kik. After V1 stopped communicating with **Officialcrowns** on Kik, a person unknown to V1, emailed her on August 30, 2018 from the email address **tagerdude25@gmail.com**. The email states, “... you gotta respond soon or they will sell your stuff.. please remain active so I can help you.” Information provided pursuant to a subpoena by the Google LLC for email account **tagerdude25@gmail.com** revealed several IP addresses used by the account. Information provided pursuant to a subpoena by the Internet Service Provider for one of the IP addresses used came back to an address in Gaston, South Carolina.

16. During the review of V1’s email account, a second email was found from someone purported to be “Jessica Mills”, a person unknown to V1, from email

Jessicamillsmoderator@outlook.com. The email, sent on September 2, 2018, from Mills stated, “We are having trouble getting in contact with you about finishing the program. Would you like to finish? Or would you like to start having your subscribers contact you again?” Information provided pursuant to a subpoena showed that the email account had been created on September 2, 2018 and the name on the account was “Jessica Mills.”

17. An open source search for people associated with the Gaston, South Carolina address revealed **Andrew Thomas Tager**, date of birth XX/XX/1990, to be one of the people possibly associated with the address. A review of records with the Department of Motor Vehicles (DMV) for South Carolina and North Carolina conducted for **Tager** showed he had been issued a driver’s license in both states. North Carolina issued the most recent driver’s license for **Tager** on November 2016 and listed a Greensboro, North Carolina address.

18. An open source search was conducted for social media accounts belonging to **Tager**. An Instagram account under the username “**atagerofficial**” appeared to belong to **Tager**. The profile picture on the account looked like the same person in **Tager**’s DMV photos. The account had several pictures that were available for public view that featured **Tager** in them. Information provided pursuant to a subpoena for Instagram records showed the name listed on the account to be “**Andrew Tager**”. The records showed the email address registered to the account was **tagerdude24@gmail.com**. Records also showed the time and date IP addresses were used to log into the Instagram account. On September 8, 2018, the **atagerofficial** account logged in using IP address 174.255.130.57 at 13:45:30 UTC. A review of Kik records for **Officialcrowns** showed the same IP address, 174.255.130.57, was used on September 8, 2018 at 14:18:29 UTC. Verizon Wireless is the Internet Service Provider for IP address 174.255.130.57.

19. Starting on August 26, 2018, V1 received text messages from someone unknown

to her at phone number (336) 314-6434. The area code 336 is one of two area codes currently being used in the Greensboro, North Carolina area. The contents of the text messages included V1's name and "Hello". V1 did not respond to the text messages. The cell phone service provider with subscriber information was Tracfone Wireless, Inc. for phone number (336) 314-6434. Tracfone is a prepaid, no contract, reseller, mobile phone provider that does not require the user to provide their name to use their service. Subscriber records provided by Tracfone pursuant to a subpoena did not have the subscriber's name for the subject phone number (336) 314-6434. The records showed the account had been activated on May 24, 2017.

20. Verizon Wireless provided records pursuant to a subpoena for IP addresses used by **Officialcrowns** on Kik. The Verizon IP addresses were used by **Officialcrowns** between August 26, 2018 and September 12, 2018. The Verizon records showed phone number (336) 314-6434 had been assigned the IP addresses during the times in question. Verizon is one of the wireless providers that Tracfone uses to offer their services as a reseller. Verizon maintained network connection records for phone number (336) 314-6434. The IP addresses submitted to Verizon included the IP address 174.255.130.57 that had been used at 13:45:30 UTC and 14:18:29 UTC by **atagerofficial** and **Officialcrowns** as noted previously.

21. A TikTok account under the username "**cherokeetager**" was found during the social media search and appeared to belong to **Tager**. The profile picture on the account appeared to be the same profile picture that was used in the Instagram account **atagerofficial**. Several videos on the account that were available for public view featured **Tager**. The profile also listed other social media accounts for **Tager**, Snapchat username "**cherokeetager**", and Instagram username "**atagerofficial**". Information provided pursuant to a subpoena for the TikTok **cherokeetager** account revealed the phone number associated with the account was



(336) 314-6434. Records also showed the account was created on June 19, 2017.

22. A subpoena for account information was served to Snapchat for user name **cherokeetager**. Snapchat records revealed the email for the account was **tagerdude28@gmail.com** and the account was created on July 3, 2016. Records also showed several IP addresses used to login and logout of the account. The IP address 70.63.203.62 was used to login on August 21, 2018 at 16:25:14 UTC. IP Address 70.63.203.62 was compared to Kik records and revealed that the user of the **Officialcrowns** account had been on that IP address on August 21, 2018 at 16:23:24 UTC and 16:32:07 UTC. Information provided pursuant to a subpoena by the Internet Service Provider for the IP address 70.63.203.62 revealed that the IP address had been assigned to the Greensboro Public Library, located in North Carolina, since June 2016.

**Google Records - tagerdude24@gmail.com**

23. I reviewed the records provided by Google for the emails address **tagerdude24@gmail.com**. On January 5, 2018, **tagerdude24@gmail.com**, with the name listed as "gerald caulder", sent an email to **tagerdude25@gmail.com**. The subject line stated "Re: Ava's Crown Portfolio". The email stated that Ava had not been accepted for a "Crown" and it included a list of things she needed to complete to get into her portfolio. The list included that Ava needed to be trained by her Moderator "Musicalcrownpage" and she needed to improve her ability to listen and follow instructions from Musical.ly and her Moderator "Musicalcrownpage". The bottom of the email had the name listed as "Jarod Glazana", Musical.ly Director of Crown Distribution. The terms and subject matter discussed in the email was similar to the verbiage **Officialcrowns** used with chatting with V1. Some of the same terms used were "Program", "Crown," and "Moderator". The email also made to look like it was coming from an employee of



Musical.ly, like the Musical.ly employee Dianna that chatted with V1.

24. I found emails that indicated that the email address tagerdude24@gmail.com was controlled and used by **Tager**. For example, an email addressed to **Andrew Tager** that was from a credit card company and in another email there was a resume for **Andrew Tager** that contained a headshot picture of him. On an email dated March 21, 2019, tagerdude24@gmail.com, with the name listed as "gerald caulder", sent an email to tagerdude25@gmail.com. The email included an attached file that was a scanned copy of **Andrew Tager's**, date of birth XX/XX/1990, North Carolina driver's license, number 000035129957. I believe the name "gerald caulder" was an alias for **Tager**.

**Google Records - tagerdude25@gmail.com**

25. I reviewed the records provided by Google for the emails address tagerdude25@gmail.com. In the records I found two video files of what I believe to be child pornography. On December 19, 2017, tagerdude25@gmail.com, with the name listed as Brian Zimmerman, sent an email to tagerdude24@gmail.com. The body of the email stated, "Toothbrush and shirt lift". The email had two video files attached. One video depicted what appears to be a minor female, approximately between 11 and 14 years of age, nude, exposing her chest and vagina. The minor female, multiple times, rapidly inserts and removes a toothbrush from her vagina. On a separate email also dated December 19, 2017, tagerdude25@gmail.com, with the name listed as Brian Zimmerman, sent an email to tagerdude24@gmail.com with the subject line, "From behind ass opening". The email contained a video file in which a minor female, approximately between 9 and 12 years of age, is nude from the waist down, spreading her buttocks, and exposing her vagina and anus to the camera.

26. On July 3, 2018, tagerdude25@gmail.com, with the name listed as Brian

Zimmerman, received an email from what appeared to be an adult female. The email contained a string of emails between the two dating back to May 2015. In one email, tagerdude25@gmail.com told the user that she could contact him on his Kik account, username **Officialcrowns**. As described previously, **Officialcrowns** was the same Kik account the subject used to chat with V1.

27. On August 30, 2018, tagerdude25@gmail.com, name listed Brian Zimmerman, sent an email with the subject line, "Your Program Status." The email states, "... you gotta respond soon or they will sell your stuff.. please remain active so I can help you." This email was the same email V1 received. I believe the name Brian Zimmerman is an Alias for **Tager**. In another email to **Tager** from his brother, his brother asks, "You still going by Brian Zimmerman? Lol You never explained that alias to me."

28. I found emails that indicated that the email address tagerdude25@gmail.com was controlled and used by **Tager**. On December 29, 2018, tagerdude25@gmail.com, now with the name listed as **Andrew Tager**, emailed an individual with the subject line, "**Andrew Tager's** Resume." In the body of the email, tagerdude25@gmail.com states he is **Andrew**. It also states that he is looking for a career in the gaming industry and is signed "Kind Regards, **Andrew Tager**." Attached to the email was a file called "Resume\_Andrew Tager.PDF." The resume had **Tager's** phone number listed as (336) 314-6434.

#### **TikTok Records – Cherokee**

29. I reviewed TikTok records for the **cherokeetager** account which I believe was used by **Andrew Tager**. The profile picture on the account appeared to be **Tager**. During the review, I discovered that **cherokeetager** had contacted several other TikTok users that appeared to be minor females and told them about a "Crown Program". In one chat conversation between

**cherokeetager** and a user identified with ID number 6559335184284745734. **Cherokeetager** states that he is in a Crown Program that promotes his account directly and he gains more fans and likes. **Cherokeetager** told the other user to download the Kik app and let him know when it is downloaded so he can have "Jessica" contact them. **Cherokeetager** states that she, Jessica, sets up the rules. **Cherokeetager** told the user that he had to do exactly everything she was doing and that Jessica was very smart and she will take 100% care of her. **Cherokeetager** states, "I swear on my life, if you listen to Jessica, she will gain you ALOT of fans." Later **Cherokeetager** tells the user to get back on the Crown Program app and talk to Jessica. I reviewed the profile page of user ID 6559335184284745734 and she is a minor approximately between 10 and 12 years of age.

30. In another chat between **Cherokeetager** and user ID 6626056930223931397, **Cherokeetager** tells the user that if she wants fans like him they need to get the Kik app. **Cherokeetager** tells the user the app is needed to talk to Jessica and describes her as a Moderator for TikTok Headquarters. The user states she can't download the app and **Cherokeetager** responds, "Ok then you don't get any fans and you don't get a Crown." I reviewed the profile page of user ID 6626056930223931397 and she is a minor approximately between 10 and 12 years of age.

#### High Point Police Department

31. I reviewed an incident report from the High Point Police Department, North Carolina, from June 2017 involving **Tager**. In the incident report, the complainant advised that her 12 year old daughter had been receiving inappropriate messages from **Tager**. The complainant alleged that **Tager** was texting her daughter using the app Snapchat. **Tager** told the minor female that he wanted to date her and her twin sister. **Tager** said he wanted them at the

same time “as package deal.” **Tager** told the minor female not to tell her mom and not save the messages on Snapchat. **Tager** said he wanted to take the twins swimming and he would take the minor female’s top off. Also, after the minor female stated she was a virgin, **Tager** stated, “you won’t be after this, you’re gonna love have sex with me.” **Tager** was interviewed by detectives and he denied making any illegal or inappropriate conversations on any app with the minor females in the case. The local district attorney’s office reviewed the case and declined to pursue charges in the matter.

### Interview of V2

32. On April 2, 2019, V1’s friend, V2, that told her about earning a “Crown”, was interviewed by a child forensic interviewer in Oregon. Shortly after getting the Musical.ly app someone started following V2. The follower explained how she could earn a “crown” in Musical.ly and she needed to download the app Kik and add a person. V2 downloaded Kik and the person started asking for pictures. V2 was told if she did not send the picture they would hurt her family. V2 was nine years old and in fourth grade when she first started communicating with the person on Kik. Initially V2 said no to taking pictures. V2 then sent nude pictures and videos of herself to the person on Kik because she didn’t want her family to get hurt. The videos included her dancing naked. The nude pictures included her squatting and showing her buttocks. The person would instruct V2 on how to pose. V2 took nude pictures of her whole body. V2 did not remember the user name for the person on Musically or Kik but she thought they were both something like “Get a crown now”. The person on Kik told V2 that her name was Dianna and worked for Musically. V2 thought this person was the same person that had told V1 to send him photos and videos.

**The Vic Apartments, Greensboro, North Carolina**

33. I reviewed records for Snapchat account **cherokeetager**, the account associated with **Tager**. I found that in November 2018, **cherokeetager** told another user to download the Kik app so the user could talk to “Jessica” to get more fans and likes by doing the “program”. **Tager** told the user Jessica’s account on Kik was **Tiktokoofficial**. On April 30, 2019, I reviewed records from Kik for the account that included IP address information. From March 31, 2019 to April 25, 2019, the account **cherokeetager** had only used one IP address, 174.111.194.27. The IP address was used by a Charter Communications customer. I had previously reviewed Charter Communications records for that IP address, which had also been used in October 2018 by **Officialcrowns**, and the service address came back to 707 Milton Street, Apt, 3N, Greensboro, North Carolina 27403. On May 1, 2019, I reviewed records from Charter Communications for the IP address 174.111.194.27 for use from March 31, 2019 to April 25, 2019 and confirmed it was still used at the same service address.

34. The address 707 Milton Street, Apt, 3N, Greensboro, North Carolina 27403 is located at The Vic Apartments. Lease records for the apartment showed that three females lease the apartment but **Tager** was not on the lease. I believe one of the females is in a relationship with **Tager**. On email account tagerdude24@gmail.com, **Tager** emailed the female at a similar email address that was provided for her by The Vic Apartments. In another email the tagerdude25@gmail.com account, **Tager** stated he was the boyfriend of the female by referencing her first name. It has not been confirmed if **Tager**’s primary residence is 707 Milton Street, Apt, 3N, Greensboro, North Carolina 27403.

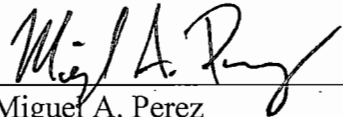
**Conclusion**

35. Based on the above information, I have probable cause to believe, and do believe,



that **Tager** violated Title 18, United States Code, § 2251(a), involving the production of child pornography, and Title 18, United States Code, § 2252A, involving the transportation, receipt, and possession of child pornography. I therefore request that the Court issue the requested criminal complaint and arrest warrant.

36. Prior to being submitted to the Court, this affidavit and the requested arrest warrant were all reviewed by Assistant United States Attorney (AUSA) Amy Potter, and AUSA Potter advised me that in her opinion the affidavit is legally and factually sufficient to establish probable cause to support the issuance of the requested complaint and warrant.



Miguel A. Perez  
Special Agent, Federal Bureau of Investigation

Subscribed and Sworn to before me this 2 day of May, 2019.



Thomas Coffin  
United States Magistrate Judge